

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

TARIFF FILING OF KENTUCKY-AMERICAN)
WATER COMPANY TO REVISE THE) CASE NO. 2006-00154
KENTUCKY RIVER AUTHORITY WITHDRAWAL)
FEE)

COMMISSION STAFF'S INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS TO
KENTUCKY-AMERICAN WATER COMPANY

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Kentucky-American Water Company ("Kentucky-American") file the original and 8 copies of the following information with the Commission within days of this request, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Refer to Kentucky-American's Response to the Commission's Order of May 1, 2006, Item 1. Describe how Kentucky-American projected "Permit 200 Withdrawal – KRS Low Service Pumpage" for the year ending December 31, 2006.

2. Provide Kentucky-American's "Permit 200 Withdrawal – KRS Low Service Pumpage" for each year since December 31, 2001.

3. Refer to Kentucky-American's Response to the Commission's Order of May 1, 2006, Item 1. Describe how Kentucky-American projected "Transfer Pumpage to Watershed" for the year ending December 31, 2006.

4. Provide Kentucky-American's "Transfer Pumpage to Watershed" for each year since December 31, 2001.

5. Refer to Kentucky-American's Response to the Commission's Order of May 1, 2006, Item 1. Describe how Kentucky-American projected "Permit 201 – RRS Low Service Pumpage" for the year ending December 31, 2006.

6. Provide Kentucky-American's "Permit 201 – RRS Low Service Pumpage" for each year since December 31, 2001.

7. Refer to Kentucky-American's Response to the Commission's Order of May 1, 2006, Item 1. Describe how Kentucky-American projected "Transfer from KRS to Watershed" for the year ending December 31, 2006.

8. Provide Kentucky-American's "Transfer from KRS to Watershed" for each year since December 31, 2001.

9. Provide all correspondence and internal memoranda created since May 25, 2001 in which Kentucky-American discusses fees imposed by the Kentucky River Authority Withdrawal Fee or Kentucky River Authority Withdrawal Fee found in Kentucky-American's rate schedule.

10. Refer to Kentucky-American's Fifth Revised Tariff Sheet No. 55.1.

a. Define "immaterial" as the term is used in the tariff sheet.

b. State whether the tariff required Kentucky-American to make annual adjustments to the Kentucky River Authority Withdrawal Fee.

11. State, for each year, beginning with January 1, 2002, whether an annual adjustment to the Kentucky River Authority Withdrawal Fee to reflect any over or under collection of Kentucky River Authority fees. For each of those years for which an adjustment was required, state why Kentucky-American failed to submit an adjustment.

12. State why Kentucky-American failed to mention the over-recovery in its cover letter to its proposed tariff revision.

13. State why Kentucky-American should not be required to pay interest on any over-recovery that was not adjusted in the following year.



Beth O'Donnell
Executive Director
Public Service Commission
Post Office Box 615
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DATED: June 27, 2006

cc: Parties of Record